



October 25, 2018

Via Electronic Filing

Marlene H. Dortch
Secretary
Federal Communications Commission
445 Twelfth Street SW
Washington, DC 20554

Re: Advanced Methods to Target and Eliminate Unlawful Robocalls (CG Docket No. 17-59)

Ms. Dortch:

On October 24, 2018, I met with Eric Burger of the Office of Strategic Planning & Policy Analysis to discuss the FCC's current proposal to create a reassigned numbers database. The purpose of this database is to provide a comprehensive resource of reassigned numbers that responsible callers can use to avoid placing cellular calls to numbers that are no longer in use by the consumer that consented to receive those calls.

Ontario Systems, LLC is a technology provider to over 1,200 clients in a variety of industries and offers a variety of products, including a suite of contact management solutions. Our products assist many businesses in enhancing their compliance efforts and facilitating business consumer interactions surrounding payment of accounts receivables.

We note that there are commercial offerings that currently try to solve the same issue that that the FCC is seeking to address with this database. With that said, we believe that the FCC's solution would better accomplish this goal if a safe harbor against TCPA litigation is created for those responsible callers that use the FCC database. By adopting a safe harbor that protects a responsible caller that uses this database from potential TCPA litigation, the FCC will promote caller adoption and technology providers, like ourselves, to integrate to the database.

If such a safe harbor is not created, the proposed database would not warrant the technology investment to integrate to a new solution.

This notice is being filed in the above-referenced docket for inclusion in the public record. Please contact me should you have any questions.

Ms. Dortch
October 25, 2018
Page 2 of 2

Respectfully submitted,

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